

Batka, Allan

From: Rzeznik, Dana
Sent: Friday, October 16, 2015 1:31 PM
To: Batka, Allan; Perenchio, Lisa; Roy, Stephen; Micham, Ross
Subject: Re: Class I non-haz permit question

Hi Allan,

We (R5) have never required groundwater monitoring wells for Class I nonhaz wells. Under 146.13(d):

(d) Ambient monitoring.

(1) Based on a site-specific assessment of the potential for fluid movement from the well or injection zone and on the potential value of monitoring wells to detect such movement, the Director shall require the owner or operator to develop a monitoring program. At a minimum, the Director shall require monitoring of the pressure buildup in the injection zone annually, including at a minimum, a shut down of the well for a time sufficient to conduct a valid observation of the pressure fall-off curve.

(2) When prescribing a monitoring system the Director may also require:

(i) Continuous monitoring for pressure changes in the first aquifer overlying the confining zone. When such a well is installed, the owner or operator shall, on a quarterly basis, sample the aquifer and analyze for constituents specified by the Director;

(ii) The use of indirect, geophysical techniques to determine the position of the waste front, the water quality in a formation designated by the Director, or to provide other site specific data;

(iii) Periodic monitoring of the ground water quality in the first aquifer overlying the injection zone;

(iv) Periodic monitoring of the ground water quality in the lowermost USDW; and

(v) Any additional monitoring necessary to determine whether fluids are moving into or between USDWs.

Section 146(b)(4) would only apply if the Director in fact required such monitoring.

Please let me know if this explanation is sufficient.

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From: Batka, Allan
Sent: Friday, October 16, 2015 12:13 PM
To: Rzeznik, Dana; Perenchio, Lisa; Roy, Stephen; Micham, Ross
Subject: Class I non-haz permit question

Class 1 permit writers,

I am reviewing the Michigan Potash Class 1 non-haz application. Regarding monitoring wells within the AOR (to monitor the USDW) identified in 146.13 (b)(4), it appears that these mon wells are required. MP's application states that this is not required for Class 1 non-haz wells. Cargill's Class 1 non-haz application also states that monitoring wells in the AOR are not required for non-haz injection wells. I check several other Class 1, non-haz permit applications in the file room and they do not contain information on monitoring wells in the AOR.

146.13 (b) states that at a minimum, monitoring shall include, 146.13(b)(4) wells in the AOR. In addition, 146.13 (c) (iii) requires reporting of 146.13(b)(4).

Is a Class 1 non-haz facility required to use wells in the AOR to monitor the USDW?

What am I misunderstanding?

Any help would be appreciated.

Thank you